

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

DEVYANI KHOBRA GADGE and
AAKASH SINGH RATHORE,

Defendants.

CIVIL ACTION NO. 1:18-cv-11134

**DECLARATION OF JANE DOE IN
SUPPORT OF PLAINTIFF JANE
DOE'S MOTION FOR LEAVE TO
PROCEED USING A PSEUDONYM**

I, JANE DOE, pursuant to Section 1746, title 28, United States Code, hereby declare as follows:

1. I submit this Declaration in support of the Motion for Leave to Proceed Using a Pseudonym (the "Motion").
2. I am using the pseudonym of "Jane Doe" because I wish to remain anonymous and I do not wish to draw attention to myself or others because I fear both physical and psychological harm by the disclosure of my real name in the above captioned action.
3. Beginning in or around November 2012, I was employed as a live-in domestic worker in the Defendants' home, located in New York City.
4. During my time in Defendants' home, Defendants subjected me to harsh working conditions, psychological distress, and verbal abuse.
5. In June 2013, I escaped from the Defendants' home. I now reside with my two children in New York City.

6. In the period following my escape, I felt isolated. I could not contact my family in India because they received harassing telephone calls each time after we spoke. I believe their phones were being bugged. Not being able to communicate with my family made me very sad.

7. I also experienced depression, anxiety, restlessness, and insomnia. For four months after I escaped, I lived in a shelter and saw a counselor twice a week. After leaving the shelter, I spoke with my counselor once a month over the phone.

8. And since escaping from the Defendants' home, I have built ties with the Indian community here in New York. I believe that publicly revealing my name and my lawsuit against the Defendants would force me to relive my trauma as members of these communities learn of my experiences working in the Defendants' home. I also fear the harm to my reputation and judgment, both here and in India, from these groups that my lawsuit would cause. If my name was revealed, I believe I will be stigmatized and lose a valuable support system. I believe I will be seen as ungrateful because house servants in India typically work similarly long hours for much less pay.

9. I also fear retaliation against myself and my family if my name and whereabouts are revealed. In particular, should Defendants learn where I reside, I fear they will have their associates contact me and threaten me with physical or psychological harm. After I escaped, my husband and two children and extended family were physically and psychologically harassed and harmed while living in India. My children have since moved to New York City, but I fear they will be harmed again if our location is disclosed. I also fear further retaliation against my extended family, who still live in India, if my name is disclosed. Some of these relatives still blame me for the loss of their jobs following my escape.

10. I also am afraid that this lawsuit will generate further interest in Defendant Khobragade and my claims by the press, both in India and the United States. I am worried that

this increased attention could result in the press contacting me and disclosing my whereabouts. I believe that the reporting of my story will further traumatize my extremely personal and private experiences.

11. A Hindi interpreter has translated this document for me.

I declare under penalty of perjury that the foregoing is correct.

Dated: November 26, 2018



Jane Doe

AFFIDAVIT OF TRANSLATION

I certify that I am proficient in English and Hindi, and that I have read and translated the above Declaration of Jane Doe in Support of Plaintiff Jane Doe's Motion For Leave to Proceed Using a Pseudonym for Ms. Doe and that the translation is true and accurate to the best of my ability.

Tahmina B Shompa

Tahmina Shompa

Sworn to before me this 26th day of November, 2018

Yvonne Cappelletti
Notary Public

